

1 Yitzchok Birnhack _____ (Full Name)
2 isaacbirl@gmail.com _____ (Email Address)
3 4919 20th Avenue _____ (Address Line 1)
4 Brooklyn, NY 11204 _____ (Address Line 2)
5 347-409-8300 _____ (Phone Number)



6 Defendant _____ in Pro Per
7 (indicate Plaintiff or Defendant)

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 HFC ACCEPTANCE LLC ,
12

Case No.: 2:23-CV-07744

13 Plaintiff,
14 vs.
15 AEZ Rent A Car LLC et. al.

16 _____
17 _____
18 **DEFICATION IN SUPPORT OF**
19 **MOTION TO COMPEL ARBITRATION**
20 **VACATE DEFAULTS, STAY ACTION**
21 **AND AWARD SANCTIONS**
22 _____
23 _____

24 **Hearing Date:** January 6, 2024

25 **Hearing Time:** 8:30am

26 **Judge:** George H. Wu

(Judge's name)

27 **Place:** Courtroom 9D
(courtroom number)

28 I, Yitzchok Birnhack, declare as follows:
(print name)

29 1. I am the Defendant in the above-entitled case.
(indicate Plaintiff or Defendant)

1 2. I have personal knowledge of the following facts, and, if called as a
2 witness, I could and would competently testify thereto.

3 3. I discussed and attempted to resolve the issues raised in this motion
4 with the opposing counsel in this case on (date): October 15, 2024.

5 4. I submit this declaration in support of my motion to compel
6 arbitration, vacate defaults, stay the action, and sanction Plaintiff for frivolously
7 bringing this action.

8 5. The agreement between the parties (See Complaint Ex. 1) clearly
9 and unambiguously contains an arbitration clause. Plaintiff flagrantly ignored the
10 same by frivolously bringing this matter to this court.

11 6. As such, this court should grant my motion to compel arbitration,
12 vacate the defaults wrongfully entered, stay this action, and sanction Plaintiff
13 for its frivolous filing of this action.

14 7. _____
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17 8. _____
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20 9. _____
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23 10. _____
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26 11. _____
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1 12. _____
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5 13. _____
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9 14. _____
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12 15. _____
13
14 I declare under penalty of perjury that the foregoing is true and correct.
15 Executed on November 21, 2024, in Brooklyn, NY.
16
17

(date of signing)

(city, state of signing)

Yitzchok Birnhack

(signature)

Yitzchok Birnhack

(name)

Defendant

in Pro Per

(indicate Plaintiff or Defendant)